

CRIMINAL DOCKET # 13-171-2(J.H.S.)

RECEIVED
FEB 5 2015
JANUARY , 2014

MR. ROLAND B. JARVIS - ATTORNEY AT LAW

1528 WALNUT STREET - SUITE #1400

PHILADELPHIA, PA. 19102

RE: REQUEST THAT YOU FILE MOTION FOR ADDITIONAL DISCOVERY.

DEAR MR. JARVIS :


I AM ASKING THAT YOU FILE A CONTINUING DISCOVERY DEMAND FOR THE FOLLOWING DOCUMENTS AND INFORMATION LISTED BELOW. I AM MAKING THIS REQUEST DUE TO DISCOVERY ISSUE'S AND CASELAW THAT CAME TO MY ATTENTION AFTER ANY PREVIOUS DISCOVERY MOTIONS THAT YOU MAY HAVE FILED IN THIS MATTER. IT IS IMPERATIVE THAT I RECEIVE THESE DOCUMENTS IN ORDER THAT I CAN BE PREPARED FOR A SUCCESSFUL DEFENSE OF THIS CASE. WITHOUT THESE DOCUMENTS I MAY HAVE TO DELAY THE TRIAL DATE UNTIL SUCH INFORMATION IS TURNED OVER BY THE GOVERNMENT. I WOULD APPRECIATE IF YOU WOULD SET A SCHEDULING DATE FOR THIS DISCOVERY REQUEST TO BE HONORED.

REQUEST THE FOLLOWING DOCUMENTS:

- 1.) REQUEST THE GOVERNMENT PROVIDE BRIEFING ON THE NUCLEUS OF EVENTS THAT LED TO THE COMMITTING OF THE CRIMES, THE NEXUS OF THE CREATION OF THE CRIMES BY THE GOVERNMENT, HOW THE REVERSE STINGS CAME INTO EXISTENCE, AND HOW AND WHY THE CONFIDENTIAL INFORMANT CAME INTO THIS CASE AND TARGETED THE DEFENDANTS.
- 2.) A COPY OF THE JULY 12, 2013, A.T.F. MANUAL THAT RELATES TO TRAINING FOR SUCH STINGS BY A.T.F. AND HOW SUCH TARGETS ARE TO BE SELECTED, INCLUDING ANY PROVISIONS RELATING TO THE IDENTIFICATION OF TARGETS, AND THE APPROVAL PROCEDURE. GRANTED BY - U.S. V. ALEXANDER, 2013 U.S. DIST. LEXIS 172975.
- 3.) REQUEST THE OTHER TRAINING DOCUMENTS TURNED OVER TO THE COURT BY THE GOVERNMENT IN UNITED STATES V. PAXTON, 2014 U.S. DIST. LEXIS 56857 (9TH. CIR.). THE GOVERNMENT TURNED OVER TO THE COURT ADDITIONAL DOCUMENTS THAT EXISTED AND THAT IT ACQUIRED IN RELATION TO DRUG STASH HOUSE STINGS COMMITTED BEFORE THE MANUAL DATED - JULY OF 2013.

- 4.) A COPY OF THE MANUAL THAT THE GOVERNMENT TURNED OVER TO THE COURT AS RELATES TO DRUG STASH HOUSE STINGS AND HOW THEY ARE CONDUCTED AND TRAINED FOR SUCH. THIS MANUAL WAS GIVEN TO THE COURT EX PARTE IN UNITED STATES V. HARE, 2014 U.S. DIST. LEXIS 53107 (4TH. CIR.)
- 5.) ALL POST ARREST REPORTS SUBMITTED CONCERNING THE C.I. AND CORROBORATION BY THE A.T.F. OF INFORMATION GIVEN TO THE A.T.F. BY SUCH INFORMANT BEING RELIABLE.
- 6.) ANY GOVERNMENT POLICY OR DIRECTIVE REQUESTING OR MANDATING THAT THE A.T.F. BEGIN PLAYING A ROLE IN THE SO CALLED WAR ON DRUGS, OR A ROLE IN REDUCING THE QUANTITY OF ILLICIT DRUGS IN THIS COUNTRY, AND STOPPING "DRUG STASH HOUSE ROBBERIES".
- 7.) ALL GOVERNMENT REPORTS INDICATING THAT THE A.T.F. HAD PRIOR INFORMATION OF THE DEFENDANT'S KNOWN CRIMINAL CHARACTERISTICS, AND ALL REPORTS WHICH INDICATE THAT THE A.T.F. AND GOVERNMENT HAD INDIVIDUALIZED SUSPICION OF THE DEFENDANT BEFORE ATTEMPTING TO RECRUIT HIM OR HIS CO-DEFENDANT(S) TO COMMIT A "DRUG STASH HOUSE ROBBERY".
- 8.) ALL REPORTS OR MANUALS WHICH ENTAILS HOW THE DEMOGRAPHIC AREA OR NEIGHBORHOOD IS DETERMINED AS TO WHAT AREA TO CONDUCT SUCH DRUG STASH HOUSE STING IN.

MR. JARVIS AS YOU TOLD ME ON OUR LAST LEGAL VISIT THAT YOU HAD NOT BEEN ABLE TO FIND THE DISCOVERY AND CD'S, I AM NOW ASKING THAT YOU INFORM ME OF WHETHER SUCH FAILURE WILL HAVE AN EFFECT ON MY DEFENSE SINCE YOU HAVE NOT HAD SUFFICIENT TIME TO REVIEW SUCH DISCOVERY. ALSO ADVISE ME WHETHER OR NOT YOU HAVE FILED A MOTION WITH THE COURT REQUESTING AN EXTRA COPY FOR YOUR INSPECTION AND RESEARCH. ALSO ADVISE ME BY LETTER OF WHEN YOU WILL BEGIN GOING OVER MY DEFENSE IN THIS MATTER AND WHAT MOTIONS YOU HAVE FILED SINCE OUR LAST COURT APPEARANCE. I AM CONCERNED THAT YOU MAY NOT BE PREPARED FOR TRIAL IN THIS MATTER. PLEASE ATTEMPT TO GET THE DISCOVERY IN THIS LETTER. A RESPONSE AT YOUR EARLIEST CONVENIENCE IS RESPECTFULLY REQUESTED.

RESPECTFULLY SUBMITTED,

ASKIA WASHINGTON # 69032-066

CC:
HON: JOEL H. SLOMSKY, U.S.D.J.

A. WASHINGTON - FOLDER